U.S. DEPARTMENT OF COMMERCE
National Technical Information Service

PB-257 639

An Assessment of Decentralization in EPA

Environmental Protection Agency

Dec 72

BIBLIOGRAPHIC DATA SHEET	1. Report No.	2.	3. Recipient's Accession No. PB-257 639
4. Title and Subtitle An Assessment of Decentralization in EPA.			5. Report Date December 1972 6.
7. Author(s)			8. Performing Organization Rept. No.
9. Performing Organization Name and Address Environmental Protection Agency Washington, D. C. Office of Planning and Management			10. Project/Task/Work Unit No. 11. Contract/Grant No.
12. Sponsoring Organization Name and Address			13. Type of Report & Period Covered 14.

15. Supplementary Notes

16. Abstracts

The basic objectives of the assessment are to appraise the internal mechanisms of EPA decentralization, record its accomplishments, and obtain external reactions to and perceptions of Agency decentralization.

17. Key Words and Document Analysis. 17a. Descriptors

*Organizations
*National government
Organizing
Decentralization(Dispersal)
Management planning
Sites
Executives
Evaluation

17b. Identifiers/Open-Ended Terms

Federal agencies
Authority
*Environmental Protection Agency

17c. COSATI Field/Group 5A

18. Availability Statement	19. Security Class (This Report)	21. No. of Pages
National Technical Information Service Springfield, VA 22161	UNCLASSIFIED	73
	20. Security Class (This Page) UNCLASSIFIED	22. Price PC$4.50 MF$2.25

FORM NTIS-35 (REV. 10-73) ENDORSED BY ANSI AND UNESCO. THIS FORM MAY BE REPRODUCED USCOMM-DC 8265-P74

6132

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U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Planning and Management
Office of Administration

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INFORMATION SERVICE
U. S. DEPARTMENT OF COMMERCE
SPRINGFIELD, VA. 22161

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DECEMBER 1972

ENVIRONMENTAL PROTECTION AGENCY

OFFICE OF PLANNING AND MANAGEMENT

OFFICE OF ADMINISTRATION

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CONCEPT OF DECENTRALIZATION AND CHARGE FOR THE ASSESSMENT

Decentralization in EPA is an extension of the Administration policy which led to the creation of the agency.

The establishment of EPA under Reorganization Plan 3 in December 1970 reflected the President's concept "that the executive branch of the government should be organized around basic goals." Subsequent organizational and managerial decisions within EPA were structured to implement the President's policies under the New Federalism. These policies, articulated in the Federal Assistance Review (FAR), revenue sharing, grant consolidation, governmental reorganization, Federal Regional Council and other Administration initiatives are directed at increasing the effectiveness of government by reversing the flow of power to Washington and moving decision-making closer to the people. Implementation of these policies requires:

1. The decentralization of Federal assistance activities and program authorities;

2. The transfer of appropriate functions to State and local governments or the sharing of functions in a partnership role coupled with increased sensitivity by the Federal Government to State and local priorities; and

3. Improvements in Federal assistance mechanisms in order to enhance the capacity of State and local governments to carry out their responsibilities.

EPA has been in the vanguard of executive agency response to the Administration's thrust, partly because of the timing of its establishment and partly because the nature of its mission and statutory requirements mandate a close interdependency of Federal, State, and local government.

It follows therefore that the organizational concept of EPA should provide a strong regional structure as a focal point for agency program execution and integration with the capacity to deal directly and conclusively with State and local officials. To accomplish this, physical decentralization has been accompanied by a substantial decentralization of authority to Regional Administrators who are responsible directly to the Administrator of EPA. Within the policy and procedural guidance received from Headquarters, the regions by virtue of proximity are in a position to respond with greater sensitivity to the variables of State and local priorities. Headquarters in turn retains the responsibility to measure performance and evaluate accomplishment. In a larger framework the establishment of 10 regions co-located with the major domestic agencies enables EPA Regional Administrators to act in concert with their peers whether through the coordinating mechanism of the Federal Regional Council or in more routine interaction with other Executive agencies.

It should be clear, however, that the decentralizing of existing functions to the field is not our sole objective. Over the long-term, proximity, improved working relationships, sensitivity, and trust, and

the development of mutual objectives will permit the more rapid devolution of Federal authority to State and local governments, strengthening the pluralism of our Federal system.

Decentralization demands clear policy direction and good communications, and it carries with it some risks for achievement of national objectives. The literature on the subject is limited and the process involves much experimentation. Clearly, the benefit of making federalism work is worth the risk. Since EPA is deeply committed to the decentralization effort, and our regions are in a sense laboratories for governmental improvement it is necessary that we continually assess the process, test our expectations against reality and identify our problems as well as measuring our successes.

AN ASSESSMENT IS DIRECTED

Consequently, after 15 months of EPA decentralization, the Administrator directed that an assessment of the process be undertaken. A small study team was formed to conduct the assessment and provide an appraisal by the end of November. The appraisal was designed to be a useful tool in charting further EPA actions to strengthen decentralization and, in furtherance of the President's program, to be of assistance to other Federal agencies which may be pursuing a similar course.

The basic objectives of the assessment are to appraise the internal mechanisms of EPA decentralization, record its accomplishments, and obtain external reactions to and perceptions of Agency decentralization.

The principal method employed during the study has been the interview. One hundred forty-eight EPA Headquarters and regional office officials, including every Assistant Administrator (Appendix B), were interviewed during the months of September and October. Direct interviewing by the study team was supplemented by written assessments of decentralization by each of the EPA Regional Administrators. In addition, 24 State agencies and 12 cities, regional organizations, and public interest groups (Appendix B) participated by assessing EPA decentralization from their perspectives. Document reviews provided the remaining data.

Where divergent viewpoints arose during the study, they were arrayed and compared by the study team. Follow-up questions and further analysis were undertaken to obtain the facts available on each issue. This method clarified most of the issues that surfaced. The resolution of some specific issues proved to be beyond the scope of the study. Where appropriate, however, such issues are identified so that they might be considered by top management.

BACKGROUND FOR THE ASSESSMENT

HISTORICAL PERSPECTIVES

When EPA was created in December 1970, components from a number of separate Federal agencies were brought together. Principal elements came from the Environmental Health Service (including the National Air Pollution Control Administration and the Environmental Control Administration) and the Food and Drug Administration in the Department of Health, Education and Welfare; from the Department of the Interior; and from the Department of Agriculture. EPA's predecessors were organized in various ways, but decentralization was quite limited in each of the agencies. Those elements coming from DHEW were highly centralized and extremely separate categorically; those from Interior were physically decentralized in the areas of technical assistance and grants to some extent, but centralized in planning and enforcement; those from Agriculture were centralized. The programs were operating, and continue to operate, under a variety of statutes involving over a dozen congressional committees. They were geographically located on the basis of three different systems; DHEW had a ten region system based on the President's Executive Order; Interior operated with nine regions based on river basins; and Agriculture had a four region system based on administrative service points.

Consequently, at its inception EPA was not a decentralized enterprise. However, as part of the Federal Assistance Review concept. the Agency moved rapidly to adopt the ten standard Federal region concept for all of its programs, and followed this by beginning to decentralize program authorities and resources to the regional offices.

PHYSICAL DECENTRALIZATION AND DECENTRALIZATION OF AUTHORITY

In understanding decentralization in EPA, it is important to distinguish between "physical decentralization" and "decentralization of authority." Physical decentralization simply involves locating people and other resources outside of Washington, D.C. Through its system of regional offices, National Environmental Research Centers, and satellite laboratories, EPA has located 70 percent of its 9,000 employees in the field--approximately 3,100 in regional offices and 3,400 at NERC's and other field locations.

Physical location is one element of decentralization. True decentralization requires that physical location of resources in the field be accompanied by the authority to use those resources. Decentralization in EPA reflects this.

Under EPA's concept of decentralization Headquarters is the source of policy and procedural guidance, performance monitoring, and

accomplishment evaluation. The regional offices are the focal point of program execution and integration for the Agency, with the Regional Administrators exercising specific and complete program and administrative authorities for their regions, including:

a. State and local assistance (including grants and technical assistance);

b. certain enforcement and compliance regulatory actions, e.g., issuance of notices of violation of water quality standards to violators, bringing suits, etc.;

c. State implementation plans and other planning activities;

d. public information activities; and

e. general administration

The Regional Administrators also are involved in the fund allocation and policy decision-making process of EPA, and hold membership on the 10 Federal Regional Councils.

TENSIONS AND BALANCES IN DECENTRALIZATION

EPA has made considerable progress in the area of decentralization. However, there are still elements of the Agency's decentralization which can be improved. In practice, decentralization is marked by a series of created tensions and the balancing of those tensions. The

Regional Administrator is required to balance his enforcement and assistance roles. Headquarters and the regional offices must achieve some balance (a) between national and regional objectives and priorities; (b) between Headquarters' desires for uniformity and consistency and the regional office desire for operational latitude; and (c) between categorically separate national program aims and the aims of EPA program integration in the regions. In addition, by bringing the Federal government into such proximity to State governments, decentralization also emphasizes the tension that occasionally arises when Federal and State environmental protection objectives and priorities are not in harmony. Tensions such as these can prove exceedingly beneficial to the Nation's anti-pollution efforts by forcing intelligent and creative forces to cooperate with one another and balance the various perspectives which they bring to bear on environmental problems. The theme of tensions and balances, as is reflected in this paper, underlies most of the issues remaining in EPA decentralization.

HEADQUARTERS DISCIPLINE AND DECENTRALIZATION

In October 1971, the participants in the Federal Management Improvement Conference concluded that:

> "Decentralization is not administrative anarchy. It does not leave the recipient of delegated authority

free to administer as he wishes. If decision-making is to take place in many different field locations and still consistently support the mission of an agency, there must be policies supported by appropriate standards and procedures and they must be communicated to field officials to guide them in the exercise of their authority. Thus, a thought-through, articulated, and communicated policy framework for field decision-making is a must if decentralization is to succeed."

and

"Decentralization is dependent upon an agency leadership which truly believes that it is necessary and that it will be beneficial to the organization. The leadership needs to use every means possible of conveying to the second and third echelons of headquarters officials, where resistance to decentralization tends to be strongest, their determination and unqualified support. If the headquarters bureaucracy senses hesitation, indecision, or a mere pro forma desire to conform to a program such as the Federal assistance review, all kinds of reasons will be developed for inaction or for curbing the scope of the decentralization effort." (pp.109, 110, Proceedings of the Federal Management Improvement Conference, Oct. 18, 19, 1971)

There clearly is a considerable need for disciplined Headquarters participation if decentralization is to achieve its potential. This is closely related to the tensions and balances theme described above and is useful both in assessing EPA decentralization to date and in determining appropriate next steps.

BENEFITS AND ACHIEVEMENTS UNDER EPA DECENTRALIZATION

Our assessment indicates that even within the short time frame decentralization has resulted in noteworthy benefits. It has provided the Agency with the sensitivity and operational latitude to address specifically State and local problems which previously may not have received needed attention. It has fostered EPA program integration--one of the basic reasons for creation of the Agency--through experiments with consolidated environmental grants, and because of the Regional Administrator's need to balance various programs to accomplish Agency objectives. It is providing opportunities for improving intergovernmental relations and cooperation, to foster a closer partnership of governments. It also permits the Regional Administrators to be fully responsive participants in the President's Federal Regional Councils. Some of the specific benefits and achievements, illustrating the potential of the concept for facilitating the accomplishment of Agency aims, have been selected as examples for inclusion in this paper.

CONSOLIDATED ENVIRONMENTAL GRANTS

EPA decentralization has placed authority to award most EPA State and local assistance grants in the hands of the Regional Administrators. Before decentralization these same authorities were

exercised by several different Headquarters program officials. Because the RA now exercises these authorities, marked strides have been possible in the areas of environmental program integration and the overall environmental approach to the solution of pollution problems. This year, EPA's first consolidated environmental program grants have been awarded as pilot projects designed to test a totally new EPA grant delivery system. The pilot projects were developed as cooperative undertakings between four EPA regional offices and the States of Hawaii, New York, Utah, and Washington. Initiation of the pilot projects, which combine into one grant previously separate grants for the management of air pollution control, water pollution control, and solid waste management programs, was greatly facilitated by decentralization. The regional offices not only negotiated directly with the States, but were able to carry those negotiations through to a fruitful conclusion because of their delegated authorities. A number of States and Regional Administrators have expressed a desire to expand this effort in FY 1973. (As an aside, the new system has resulted in a 71% decrease in paperwork for the States as compared to their grant submissions of the previous fiscal year.)

COOPERATIVE REGIONAL OFFICE/STATE RAP PROGRAM

EPA Region X and the Oregon Department of Environmental Quality have established a cooperative State/Federal waste discharge program and

established policies and procedures for issuance of municipal and industrial waste discharge permits in Oregon. The agreement was made possible because EPA authorities under the Refuse Act Permit Program were delegated to the Regional Administrators, and the RA in Region X opted to try a novel approach. Under the terms of the agreement, the Federal and State entities share the responsibility for review and preparation of the permits, and the State agrees to issue permits which are consistent with Federal legislation, regulations, and guidelines.

REGIONAL OFFICE/STATE COOPERATIVE GRANT APPLICATION REVIEW

EPA Region X and Washington State have agreed on specific review parameters acceptable to both parties, and have jointly established a procedure whereby the state reviews half of all incoming plans and specifications, and EPA the other half, under the Agency's construction grant program, thus eliminating all duplication of effort. The State issues an approval letter on projects it has reviewed and sends a copy to Region X. The Regional Office subsequently issues a similar approval letter, without having duplicated the State review of the plans and specifications.

CALIFORNIA CERTIFICATION PROGRAM

A similar program has been developed by EPA Region IX and

California. In Region IX, California currently reviews all waste treatment facility construction plans and specifications, using a checklist developed by State and Federal staff. The EPA Regional Office has agreed to accept the State's review of plans and specifications, and thereby eliminates a major duplication of effort. Region IX staff continue to review for project eligibility and to determine that certain Federal requirements are met. Federal personnel now seldom review technical portions of the plans and specifications after they are reviewed by the State. The certification system is now proposed as agency wide policy.

FRC COOPERATION IN EPA ENFORCEMENT ACTION

EPA Region VI has been able to obtain multi-agency cooperation in regard to an EPA enforcement action in New Orleans through the Federal Regional Council. After negotiations with the city of New Orleans by both the State of Louisiana and the EPA Regional Office did not achieve a satisfactory response, an enforcement action was initiated by the region. In addition a letter to the city was signed by all members of the FRC, and the Department of Housing and Urban Development Regional Office has initiated action to withhold HUD grant funds from the city until the situation is satisfactorily resolved.

JOINT PLANNING WITH STATE GOVERNMENTS

EPA decentralization has provided the Agency with a valuable opportunity for improving relationships with State and local governments. Region VII has begun to take advantage of this by seeking State government review and comment on its accomplishments plans. For FY 1974, the regional office will circulate its plans to all States in the region before the plans have been finalized. The regional office also will be trying to reflect State efforts as well as those of EPA in FY 1974 plans.

REGIONS AS MEASURING POINTS FOR ACCOMPLISHMENTS

Decentralization permits treatment of the regional offices as focal points for measuring Agency accomplishments in environmental improvement, because the regional offices deal with the spectrum of Agency programs at the point of impact. Within the framework of the EPA accomplishment planning system, the regional offices can be held accountable for the achievement of pre-stated objectives agreed to with Headquarters. Achievement of objectives (output), rather than allocation of resources (input), would be the yardstick against which regional performance would be measured.

STRENGTHENING EPA DECENTRALIZATION FURTHER

Although numerous benefits of decentralization are being realized our assessment also indicates a number of remaining issues, which when resolved, will strengthen Agency decentralization further. These issues are related to the authorities and resources which have been assigned to the regions; the degree to which the regional offices are able to exercise operational latitude; regional involvement in national policy setting; Headquarters/regional office communications, reporting, and evaluation; the effects of decentralization on the Agency's relationships with State and local governments (from both the EPA perspective and from the viewpoint of the State and local governments); EPA's involvement in Federal Regional Councils; and the effects of regional office organization structure on decentralization.

AUTHORITIES AND RESOURCES

General Appraisal

In general, there is a high degree of decentralization of both authorities and resources in EPA. The basic delegations of authority to the regional offices appear in the 1150 series of EPA Orders (Appendix A). Most of the delegations are in water and enforcement. Less authority has been delegated in air, and little has been delegated in categorical programs. Existing delegations generally are considered sufficient by both regional office and Headquarters officials.

Significant strides have been made in strengthening regional office resource levels since the beginning of EPA. The initial resource inheritance in the regional offices totalled approximately 2,200 people (1,900 from the regional offices of FWQA and a maximum of 300 from the other agency elements). The present total is 3,100, an increase of some 40%. A small portion of this increase is due to the redefinition of national program roles which resulted in the transfer of some Headquarters' positions located in the field (e.g. pesticide inspectors) to the regional offices. The major part of the increase, however, is attributable to increased employment ceilings for the expansion of existing regional programs and the addition of new regional responsibilities, as in enforcement. There were few transfers of staff from Headquarters in Washington to the Regions.

Program Authorities

There is general consensus among both Headquarters and regional personnel that with the exception of categorical programs the authorities currently delegated to the regions are sufficient. This view is supported by a review of existing EPA Orders. Some concern was expressed in the regions during the study about preclearance requirements and other limitations on delegated authorities, particularly in enforcement. Although these requirements cause some delays, the delays are not significant. Headquarters personnel indicate that the requirements will be relaxed or eliminated as experience is developed in the regional offices.

The initiative to decentralize has been in the hands of the individual Assistant Administrators. No Agency overview or plan for decentralization has been formulated. An illustrative experience, reflecting the need for systematic planning and coordination in decentralization to make it more effective in the future has occurred in the Air Program. Upon adoption of initial State Implementation Plans, the authority to update plans and approve abatement schedules to implement them was delegated to the regional offices. The regions were staffed at a skeletal level in Air with little technical expertise in implementation planning and abatement scheduling. While the Office of Air Programs in Durham has released the twenty positions related to these functions, no positions have reached the regions. Consequently, responsibilities are resident in the regions, but only limited resources with which to meet them are available. The positions have still not been distributed to the regions.

Resources

The most significant increase in regional program resources levels to date has occurred in enforcement. That program had been centralized in EPA's predecessor agencies. Table 1 below contains a current distribution of regional office personnel. It shows that, of the 817 people now in the enforcement program, 58% are in regional offices. In addition, the regional Surveillance and Analysis Divisions totalling

656 positions expend between 25% and 50% of their efforts on enforcement activities, making the enforcement function even more decentralized than is apparent in the table.

In Air Programs, regional offices now have 226 people, or 27 percent of total air resources in the Agency. The majority of Agency air personnel are in Durham and Washington. Since reliable baseline data on regional air resources at the outset of EPA is not available it is difficult to measure the progress made in decentralization of resources in this area. The general feeling, however, is that there remains a significant amount to be done.

At the Present time, only 13 percent of the Agency's resources in categorical programs are assigned to regional offices. These programs are now under intensive review by the Assistant Administrator for Categorical Programs for eventual additional decentralization.

Table 1. Regional Personnel as a Percentage of Total Agency Personnel by Major Program/Functional Area

	Air	Water	Cat.	Enf.	S&A	Mgmt.
Total in Agency	824	1204	1136	817	656	1382
Percentage in Regions	27	53	13	58	100	39

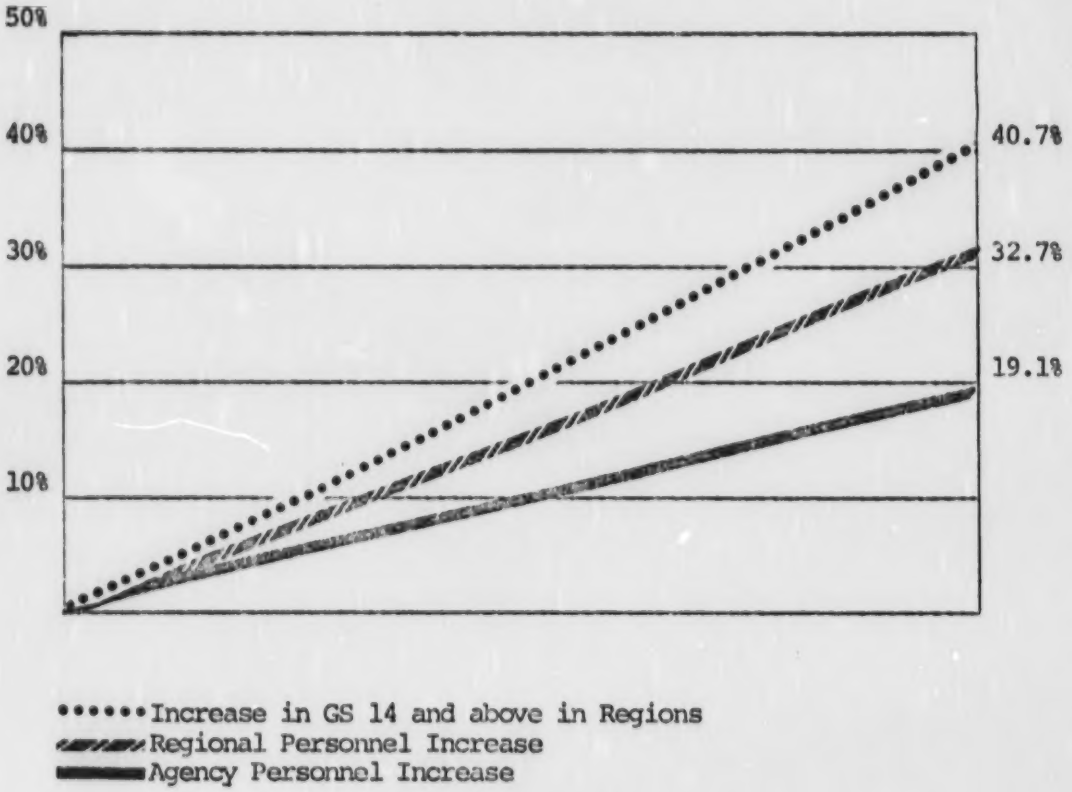
Table 2 below indicates the range of variations among the regional offices in placing resources organizationally to meet regional needs. The high degree of variation reflects two points: first, the latitude given the regions in organization structure results in differences in functional placement; and second, there also are real differences in the level of relative program emphasis among the regions.

Table 2. Range of Variation in Personnel Placement as a Percentage of Total Regional Allowance

	Air	Water	Cat.	Enf.	S&A	Mgmt.
Maximum Percentage	8	35	8	19	27	26
Minimum Percentage	4	13	2	12	14	12

Some concern was expressed by regional officials during the study about the grade structure in regional offices. In a few specific areas this concern may be valid, but as the chart below indicates, the emphasis in regional office growth has been in higher grade positions. While the average growth in regional offices in the past year has been at approximately 33 percent, the number of GS-14 and above positions has increased at a rate of 41 percent. A further indication of the emphasis of regional staffing increases is given in the October 31, 1972, Employment Summary, published by the Office of Administration. The average grade of Headquarters personnel is 9.5 while the average for the regional office is not significantly different at 9.0.

Increase of EPA Staffing Between October 1971 and October 1972



Conclusions

Authorities delegated to the regions to date are sufficient except in the Categorical Programs where delegations of authority are currently under study. These efforts and additional decentralization steps should be the result of a coordinated agency plan rather than based on the initiative of each program manager. Such an agency plan would result in a better balance among the programs in the regional offices, facilitating program integration and improved delivery of technical assistance. While the initiatives exhibited by the Headquarters program offices have been commendable, they have not been a systematic balanced approach to decentralizing authorities. Agency policy and program objectives should specify plans for regionalization to assure that regional capabilities are fully utilized in those areas of greatest importance in Agency plans.

The data contained in Tables 1 and 2 points out both the general personnel strengths and weaknesses of the regions as well as specific areas of variation. Significant levels of variations generally indicate different approaches to achieving program goals. The emphasis in resource decentralization has been on increasing the number of high level personnel in the regional offices. The greatest resource needs in the regions are in Categorical Programs. Resource increases in all decentralized programs should be phased along with authorities as they are delegated.

REGIONAL OFFICE OPERATIONAL LATITUDE

Closely related to authorities and resources is the issue of regional office operational latitude. How much flexibility do the regional offices have in program execution? Do the regional offices have sufficient latitude to tailor programs to specific regional needs? What are the existing constraints on operational latitude?

General Appraisal

In general, EPA regional offices may exercise a considerable amount of latitude in program operations within the framework of national policy. Indeed, relatively speaking, EPA Regional Administrators have substantially greater operational flexibility than do their counterparts in most other Federal agencies.

This is not to indicate that there are not real constraints on regional office operational latitude. Some of these are necessary and valuable in a decentralized agency. Others do not seem as necessary. A number of issues which should be addressed in regard to operational latitude are presented below.

The National Program Role

EPA National Program Managers play a legitimate and essential role under decentralization. They are responsible for developing national environmental programs, assuring that they are effective, and justifying the programs before Congress. Their role involves establishing national objectives and priorities, participating in the

allocation of Agency resources (to be discussed later in this section), providing policy guidance to the regional offices, and evaluating program accomplishments. The national program role is seen and fulfilled differently by different Headquarters components. Some Headquarters units operate on the basis of a very strong national program role (e.g., air pollution), while others (e.g., water supply) indicate uncertainty as to what their national role means in regard to the regions.

There is a general agreement throughout the regional offices as well as Headquarters that certain national norms need to be adhered to, and that the development of those is a responsibility of the National Program Managers. The concept of a National Program role as such is not at issue in decentralization. However, there is some concern over the degree of direct Headquarters involvement in regional activities which is rationalized on the basis of the National Program role. Most of this concern arises because of confusion about what precisely is meant by "policy." Depending upon its definition, policy can facilitate or constrain regional office operational latitude.

Headquarters Policy and Guidelines

"Policy," of course, establishes the framework within which the regional offices function: it can dictate the degree and nature of regional office operational latitude.

But, what is meant by "policy"? Concensus on the meaning of the term has not been evident during this study. While there is agreement that policy consists of legislation, regulations, EPA orders, and statements by the Administrator, the views on how specific policy should be comprise a wide range. Specifics and details in policy appear to the regional offices as excessive program direction, while Headquarters officials believe that policy that is too broad can also create problems.

From the Headquarters perspective, existing policy permits the regional offices complete latitude in all authorized areas. While this generally is the case, there also is some justification for the belief expressed by some regional office officials that Headquarters policy and guidelines sometimes are inconsistent with the authorities delegated to the RAs: sometimes becoming so specific as to become program direction (enforcement quotas); and sometimes being confused or absent (Categorical Programs and Public Affairs) or insufficient or untimely (Air and Water Programs.) When policy does cross into program direction, it fosters a dependence on Headquarters by the regional offices, which constrains their operational latitude. What top management wants to be considered Agency "policy" requires some clarification. National policy is imperative for effective decentralization. Since the ability of the regional offices to operate and to achieve objectives is so affected by the quality of the policy guidance they receive, that quality should be assessed regularly by the Agency.

Communication of national policy also is very significant. There is some question as to whether the EPA Order System is being used effectively. When it is employed appropriately, confusion resulting from informal or unstructured policy issuances, and the increasing number of individual program policy and guidance documents, can be avoided.

Planning and Resource Allocations

The present planning and resource allocations processes of the Agency are constraints on the authorities delegated to the regions, limiting their operational latitude. As presently employed, these processes place considerable influence over regional operations in the hands of Headquarters officials. Headquarters involvement in regional resource allocations (e.g., the Air and Water Programs judgements of August 1972) is a significant issue under decentralization. Although some degree of Headquarters involvement in these processes clearly is appropriate, based on the National Program Manager role, what that appropriate extent is remains open to question. There is some belief that limits should be established on Headquarters direction of placement of regional resources at some reasonable level, such as program elements involving $25,000 or more.

National Meetings

Another aspect of Headquarters involvement in regional activities that constrains operational latitude is the "National Meeting." National meetings are convened by almost every Headquarters unit.

Scheduled either regularly or on an ad hoc basis, these meetings are generally gatherings of Headquarters and regional office counterparts. From the regional office perspective, these meetings are a mechanism by which Headquarters units exert considerable influence over their regional office counterparts, developing them as specific program advocates. Aside from any direct influences such meetings might have on shaping regional office operations, they do draw regional resources away from other activities, and because of this, may be constraining progress toward the accomplishment of the Agency objectives they are intended to foster. In the absence of a better mechanism for the exchange of technical material and view points, however, national meetings are viewed as being necessary.

Regional Office Assistance Needs

In conducting their operations, the regional offices occasionally have a need for expertise which is not available in individual regions. In such instances, the regional offices seek assistance from Headquarters units, the NERCs, and National Field Investigation Centers. Regional office operational latitude is generally broadened by their ability to obtain additional expertise from other elements of the Agency. Since it is not practicable to staff regional offices with the complete range of technical expertise, some provision for according Regional requests for assistance a priority is desirable.

Conclusions

It is apparent that the National Program role, Headquarters policy and guidelines, the planning and resources allocation processes, national meetings, and regional office assistance needs can either foster or constrain regional office operational latitude. While, in general, they have not been marked constraints top EPA management can take a number of steps to assure that these elements have only positive effects on Agency decentralization. The Agency should attempt to define the Headquarters policy role in regard to regional activities more clearly and formally, with emphasis on the distinctions between the provision of policy and the provision of day to day program direction.

The Agency also should carefully examine its planning and resource allocations systems. Headquarters obviously has a valid role in determining national objectives and establishing national priorities, but within that framework it is to the Agency's advantage to foster and maintain maximum regional office operational latitude. Consequently, following the provision of planning guidance by Headquarters, the Agency should permit RA allocations of available resources to their program elements, including a reserve for unanticipated regional priorities, to be final, holding the RA accountable not for placement of resources but for achievement of objectives consistent with national policy.

National meetings, while having numerous benefits, particularly from the standpoint of technical communications, are a burden on limited regional office resources and also develop categorical alliances and reliances which affect regional office operations. The Agency should have a better technical communications mechanism, such as a system of technical bulletins. Pending this, national meetings should be limited in number, and well-structured to technical concerns, and should permit RAs to designate their own attendees.

The theme of creative tensions and balances has been obvious in this section. The constructive possibilities of balanced creative tensions are almost unlimited and can profoundly strengthen EPA decentralization. Creating an effective balance between national policy and regional needs and flexibility is a major step in this direction.

REGIONAL OFFICE INVOLVEMENT IN NATIONAL POLICY SETTING

How can the balance between national and regional objectives and priorities best be accomplished? One method is to involve the regional offices in the development of national policy. To what extent is this done at present in EPA? To what extent should it be done?

General Appraisal

For the most part, EPA regional offices regularly have the opportunity to impact the development of national policy through informal contact with the Administrator or Deputy Administrator, although this approach is usually reserved for major issues. Headquarters is the acknowledged focal point for policy development in

the Agency. At issue is how routine regional office participation in policy development might be strengthened. The regional offices maintain that unique regional situations and conditions require a considerable regional role if policies are to be realistic.

Existing Opportunities for Regional Office Participation

At the present time, there are a number of opportunities for regional office input to Agency policy-making. One of the principal mechanisms is the action list used at the quarterly Regional Administrators' meetings. This is often seen as one of the strongest direct RA inputs. Other avenues for input include review and comment on guidelines and procedures prior to issuance; direct requests from Assistant Administrators for the regions to list problems (e.g., Enforcement and the Office of Research and Monitoring, the latter believing that its programs this year will satisfy 58% of the needs expressed by the regions); and direct communication to Assistant Administrators. Most routine regional input to policy currently seems to come through program counterpart relationships.

Strengthening Regional Office Participation

Although there are numerous opportunities for regional participation in policy-making, there are still problems requiring resolution, and improvements which may be made. Among these are some failure to invite regional participation in the development of policy which appears to Headquarters to involve noncritical issues, and short lead-times for

regional review of policy drafts. Regional office participation also may be strengthened by Headquarters regularly keeping the RAs appraised of impending policy; consulting the regional offices more in new program development and priorities (e.g., feed lots); and by taking care to avoid omitting regional office input to policy where regional responsibilities are involved (e.g., memorandum of understanding between Enforcement and Air and Water Programs). Another mechanism for strengthening regional office participation in policy-making could be more frequent and better structured Regional Administrators meetings, perhaps including joint sessions with the Assistant Administrators (i.e., a "board of directors").

Conclusions

The appropriate focal point for policy making in EPA is at Headquarters. If the Agency is to operate effectively in a decentralized manner--one of the purposes of which is to be more responsive to State and local needs--this focal point must be complemented by regional office viewpoints in the development of policy. This requires strong regional involvement in the policy process. While ultimate policy decisions must be made at Headquarters, no EPA policy affecting the regions should come to the regional offices as a surprise. It is a responsibility of Headquarters to apprise the region of what action it takes on regional policy input, and why, prior to formal issuance of policy.

The Agency should establish that all policy being developed within EPA which will affect regional office operations be submitted for review and comment to the Regional Administrators, and that no policy be promulgated until regional comments and questions have been clearly addressed and answered. While it is recognized that this may make the policy development process more time-consuming, the potential improvement in Agency policy would clearly balance an additional investment in time.

The "board of directors" concept mentioned earlier would provide the strongest regional office participation in policy-making. Such an approach would require modification to the existing role of the Regional Administrator, and would also require regular staff support at a high level (e.g., in the Deputy Administrator's office).

COMMUNICATIONS, REPORTING, AND EVALUATION

The smooth functioning of the programs in the EPA regional offices on a day-to-day basis requires sound communications to facilitate clarification of policies and specialized technical guidance. Good reporting and evaluation systems are necessary for tracking and assessing progress and adjusting programs and objectives to meet new priorities. What is the current condition of these decentralization necessities in EPA?

General Appraisal

The Agency's enforcement program has developed strong communications, reporting and evaluation systems. The priority basin accomplishment plans have the same potential in the Office of Air and Water Programs. The Office of Categorical Programs is presently structuring a system. Several studies are underway in the data and information systems areas to assess Agency needs, but no single Agencywide system seems imminent.

Communications

While the Agency's existing unstructured system of communications based on personal relationships may allow for a free flow of information and be conducive to fast response in times of crisis it may precipitate serious problems. This approach to communications was inherited by the Agency, and characterized all of its predecessors. The informal approach has been reinforced by personnel being transferred from Headquarters to the regions.

Three concerns about existing communications surfaced in the regional offices. The informal system tends to undercut the authority and latitude of the RAs by Headquarters perspectives and influences being injected into programs. Frequent informal contacts also reinforce an inherited reluctance by some regional personnel to make decisions independent of Headquarters. Finally, the sheer volume of Headquarters/ regional office counterpart discussions when unrestrained consumes a significant portion of regional resources.

The existing informal system also tends to become a policy vehicle, and precludes more formal reporting and evaluation systems.

Reporting

The current reporting system in enforcement was consistently mentioned by both Headquarters and regional office officials as the one reporting system in the Agency which is now working. The priority basin accomplishment planning system just recently has been installed, and it is too early to determine its effectiveness. Early estimates, however, are positive. The system being designed in categorical programs also attests to a recognition of the need for formal reporting under decentralization.

The myriad of reporting systems inherited from predecessor organizations is overwhelmingly burdensome. Consequently, the regional offices have not used them. Care must be exercised that the newer systems now developing in the Agency are not duplicative or excessively detailed, or they too will be ineffective. A single Agency system should be developed in which reporting will be done against planned objectives, and which will foster visibility of program objectives on an Agencywide basis.

Evaluation

The informal evaluation system currently applied by most of the Regional Administrators seems to be effective for them internally. The RAs are satisfied that they can adequately evaluate performance in

their own regions. The ability of Headquarters to evaluate the regions, however, is visible only in the enforcement area. Basin accomplishment plans may become effective for evaluation purposes in the future. Evaluation capability for the Agency as a whole is dependent on an Agencywide reporting system. The lack of an output-oriented reporting system is causing Headquarters to emphasize resource input controls in place of program evaluation.

Only an Agencywide reporting system will permit evaluation and comparisons of regional effectiveness in achieving Agency program objectives. In such a system, potentially valuable variations in approach among regional offices can be assessed and communicated for more widespread implementation.

Conclusions

The Agency's communications system should be formalized and should promote policy guidance through a formal systematic technique such as the EPA directives system. Reporting requirements should be blended into a single Agencywide, quantified objectives-oriented system based on a planning mechanism which integrates and balances the programs of the Agency. Evaluation would then be based on that system.

STATE AND LOCAL GOVERNMENT RELATIONS

As part of the Administration's program of New Federalism, EPA decentralization is intended to bring authorities and resources closer to the people they serve and to the problems they are designed to alleviate. It is expected that a firmer partnership of government--Federal, State, and local--will result, and that geographic proximity will facilitate problem resolution. Is there evidence that this is happening? What is the nature of EPA/State and local government relations? Is the partnership of governments developing? Does the Agency encourage close regional office/State and local relations?

General Appraisal

Geographic proximity to State and local environmental problems which EPA regional offices provide is considered by most EPA personnel to be valuable for several reasons. Notable among them is the increased sensitivity to State and local problems and needs, with the balancing perspective of Headquarters preventing the Agency from losing perspective in a given situation. Other positive factors cited include the fiscal resource availability in the regions, which permits a more rapid response to State and local needs, and the ease with which useful planning and informal negotiation can take place. The relationships between regional offices and State and local agencies are generally improving. Indeed, some regional offices

have taken initiatives to invite States to comment on planning and regulation development, as well as to participate in interagency projects, particularly in the surveillance and analysis divisions. These initiatives are not uniform, however, and some regional offices report insufficient efforts to involve State and local Government in EPA programs.

Encouraging Regional Office/State and Local Relations

Historically, many Headquarters offices have dealt directly with States and localities on a routine basis. Now, however, the concensus in both Headquarters and the regional offices is that direct Headquarters involvement with States and localities is decreasing. While lessening in degree, direct relationships continue to exist in most program areas. This perpetuates a general feeling by States that RA's can be by-passed to get decisions reversed, and also results in confusion for States and localities about when to talk to the region and when to talk to Headquarters. However, when Headquarters does deal directly with a State or locality, appropriate regional representation is usually sought. When an appeal is made to Headquarters about a regional decision, Headquarters officials report they support the regional position. Some State-Headquarters relationships may be the result of personal friendships that have developed over the years. In general, there is still a degree of State dependence on Washington which needs to be scaled down.

Some additional actions and situations also are viewed as detrimental to building strong regional/State and local relations, such as Headquarters involvement in priority basin planning which is regarded as direction to the regions on how to deal with States. Washington is sometimes seen as being patronizing to the States, such as by promulgating regulations requiring State adoption of particular standards without consulting the States. And, finally, Headquarters "turf" battles are reported to have caused the regional offices embarassment in dealing with States and localities.

The regional offices recognize that political sensitivity means that a State or locality can always get to Washington. Regional officials are not concerned about this. They accept it as a political fact of life. They are concerned, however, about on-going Headquarters involvement in routine matters.

State and Local Input to EPA Operations

Despite some problems and constraints many regional offices are taking positive actions to increase opportunities for State and local government to impact EPA operations. The best opportunity for State and local input at this juncture, however, still seems to be personal contact bewteen State and local officials and the RAs.

This year Region VII began to invite State comment on its accomplishment plans. Next year, the regional office will circulate its

plans to all States in the region before the plans have been finalized. This will include enforcement plans. The regional office also will be trying to reflect State efforts as well as those of EPA in FY 74 plans.

Some other positive actions taken to increase the opportunity for State and local input to EPA operations have been identified by Region IV and by several surveillance and analysis personnel in the regions. Region IV reports undertaking a specific project (in this case, on aquatic weeds) following 3 days of meetings on the subject with Putnam County, Florida. The surveillance and analysis people report routine State and local involvement in the Agency's monitoring program in regard to station location and sampling coordination.

These efforts to encourage more input are only a beginning. Agency officials, at both Headquarters and the regional offices, indicate that to date States and localities have not been sufficiently involved in EPA operations. The States, according to regional office personnel, do not feel they are part of what EPA is doing; the feeling of partnership is still often missing. The States are kept aware of EPA enforcement plans, so that they may, if they choose, act on their own prior to an EPA enforcement action. However, this seems to be an exception to the general situation.

The Agency's planning process has not allowed time for constructive exchanges with States and localities. Consequently, EPA risks being ignorant of, or inadvertantly nonresponsive to, State and local needs and desires.

Conclusions

EPA regional office relationships with State and local governments are improving steadily, but are not yet as strong as they should be. This is partially due to continued direct contacts with States and localities by Headquarters officials; accessible and receptive Headquarters officials for States and localities to contact directly; and less than active efforts in some regional offices to involve States and localities more directly in EPA operations. Each of these problems can be remedied easily, and the positive steps already taken in some regions (see section on benefits) gives credence to the outlook that decentralization will have increasingly beneficial effects on the Agency's relationships with State and local governments.

STATE AND LOCAL GOVERNMENT ASSESSMENT OF EPA DECENTRALIZATION

How is EPA decentralization perceived by the State and local government agencies with which the Agency deals? This section summarizes the comments offered by a limited sample of 36 State, regional, and local agencies, and public interest groups. Although it is difficult to generalize from this sample, some of the specific points made merit Agency attention.

General Appraisal

Of the State environmental agencies responding to requests for their reactions to decentralization, there was unanimous enthusiasm for

the regional arrangement and it's potential for increased cooperation and communication with the Agency. Among the most frequently quoted improvements which the State and local agencies have experienced thus far are an increased responsiveness on the part of regional personnel to local and area problems, and an improvement in professional working relationships. Twenty-two agencies note that the regional offices offer closer working relationships and more of a sense of partnership between Federal and State offices. They also emphasize the convenience of a regional office where personal communication and understanding can take place. Despite some questions about the actual authority held by the regional offices, more than half the State agency officials responding believe that the regional offices are more aware of and sensitive to their specific problems and needs than the Federal government has been previously. However, about half of the officials also have a "wait and see" attitude about decentralization, since it is still too soon for many of them to have felt any major impact.

State Agency Perceptions

The favorable reactions to the Agency's current relationships with State environmental offices were represented by the comments of one State agency official who praised the regional office's "highly competent staff" which fosters an atmosphere of mutual trust and understanding. This region was seen as having developed a basic structure to bring State and Federal expertise to bear on specific problems. Some States

are attempting decentralization themselves and consider EPA a partner in this effort. Other positive results of EPA decentralization which were frequently mentioned were the improved communications, faster answers and interpretation, an ease in exchanging information and ideas, and increased opportunity for input into Agency policy and priorities.

Several specific examples of State/regional cooperation were mentioned. South Carolina cited five areas in which State and regional expertise have been combined to address specific problems: field surveys in estuaries, technical consultation in computer record keeping systems in radiological health programs, regulatory action on interstate water supplies, development of sewage disposal systems utilizing the basin planning concept, and information-sharing concerning population dynamics and projections. New York State, Washington, Hawaii, and Utah were all very pleased with the consolidated grant programs being implemented by the regional offices. They find it much simpler and faster to deal with the agency now, noting that it is far more expedient from the financial aspect to relate to a nearby office which is familiar with their grant situations.

Despite these achievements, all of the States indicated their belief that the regional offices are still tied too closely to Headquarters. They are either unaware of or unsatisfied with the extent of authority now in the regions. Although factually not the case, States perceive the

regional offices as having to clear even minor decisions with Washington, and are apprehensive that regional determinations could be vetoed by Washington. Most also felt there has been no evident increased reliance on State and local government, chiefly because some Agency personnel do not seem to be oriented toward it. Little effort by EPA was noted by these officials in recognizing and using the resources of State governments. State agencies often believe that their experience and expertise exceeds EPA's and that their input should be accepted on that basis.

City and County Perceptions

The National League of Cities and the U.S. Conference of Mayors and some municipal agencies contacted during the study, indicate that except for wastewater treatment construction grants most local government offices have little direct interchange with EPA programs except in the largest cities. Generally, the cities do not consider further decentralization or sub-regionalization necessary or workable. The National Association of County Officials, involved in the development of EPA State and Local Assistance Grant Regulations, expressed interest in further involvement and participation with the Agency.

Conclusions

Although the sample in this study was small, it nevertheless shows that decentralization is being very favorably received by States and

localities and that they are anxious to see it carried further. The Agency should take some action in its dealings with State and local agencies to explain what EPA's current position and its goals are with regard to decentralization. Until the State and local agencies completely understand what the intended relationships between Headquarters, regions, States and localities are, there may continue to be misunderstanding about what is being done.

FEDERAL REGIONAL COUNCIL AND OTHER INTERAGENCY RELATIONS

General Appraisal

The regional offices are very active in the Federal Regional Councils and other interagency dealings such as the Federal Executive Boards and the Natural Resource Councils. Their participation has been facilitated by EPA decentralization. These dealings yield significant benefits in the area of interagency cooperation and awareness of mutual program objectives.

Specific Benefits

Regional office officials see many specific benefits achieved through interagency coordination. The forum provided by the FRC increases the possibilities for such coordination. The social nature of pollution problems in urban areas makes the integration of urban environmental planning with other related programs especially valuable. Since EPA Regional Administrators generally have greater authority than do their counterparts in the FRC, the RAs can assume leading roles in FRC

initiatives. The ability to concert resources and policies with those of other agencies to achieve mutual goals in areas such as disaster relief assures a balanced approach in meeting all areas of need. The ability that decentralization of authority provides EPA Regional Administrators to marshall resources and respond promptly and effectively to regional problems was reflected in the response to Hurricane Agnes in Regions II and III. To the extent that other agencies do not have authorities equal to those of EPA's Regional Administrators, the FRCs are seen as being less effective than they could be. Their strength exists in the ability to respond in a coordinated manner to local problems without the delay of going to Washington for a decision. The more decentralized all agencies are, the greater is the potential for such collaboration.

Conclusions

Interagency cooperation through the FRCs already has produced benefits for EPA, and EPA decentralization has permitted the Agency to be a major contributor in FRC activities and accomplishments. As other agencies increase the degree of decentralization, the FRCs will become even more significant tools of interagency and intergovernmental cooperation.

REGIONAL OFFICE ORGANIZATION STRUCTURE

The effects of regional office organization structure on decentralization was the final major element examined during this study. Does

the standard EPA regional office organization structure facilitate or constrain decentralized operations? Are there more appropriate structures for a decentralized organization to adopt?

General Appraisal

Regional Administrators have complete authority for organizational latitude below the Division level. This coupled with the Agency's willingness to experiment with structural variations among regions provides the RAs with considerable opportunity to tailor their organizations to best address regional needs. The Agency's existing generally standard organization structure and the flexibility it permits are usually viewed favorably. There are, however, a number of aspects of existing regional organization structure which need examination by Agency top management for the purpose of strengthening operations under a system of decentralization, including: sub-regional offices; standardization and flexibility; functionalization; and program integration.

Sub-Regional Offices

Several sub-regional offices exist within the 10 EPA regions. Others have been active or proposed, but have been eliminated from plans because of personnel ceiling or budgetary restrictions. The range of existing sub-regional structures in EPA goes from none in Region I to a five office structure encompassing 25 percent of Region V staff. Regions II, VI, and X also have experience with sub-regional offices. Are they a logical extension of the EPA decentralization mode?

In general, sub-regional offices are viewed by regional staff as being valuable as listening posts, bringing EPA closer to State and local problems and policies, and easing travel and communications. This assessment is tempered by some opinion that sub-regional offices tend to "drum up" their own business; are not necessary unless a region is very spread out; and run the risk of "going native" and creating a buffer between the Agency and the States. As an opportunity for bringing EPA closer to the people and the problems, however, the concept of sub-regional offices should not be ignored.

Standardization vs. Flexibility

Some Agency officials believe that regional office organization structures should be standardized and should "mirror-image" Headquarters counterparts to facilitate communications and avoid management problems. These officials believe that current organizational latitude is too extensive. Others favor standardization but do not see the necessity for organizational "mirror-images" between Headquarters and the regional offices. Still others emphasize a strong regional need for organizational flexibility, perhaps more than currently exists. Officials most favorably disposed toward decentralization tended to adopt this view. Balancing the values between standardization and flexibility is another issue to be faced by Agency management in strengthening decentralization.

Functionalization

Although there does not seem to be concensus on the organizational standardization versus flexibility issue, most of the officials interviewed believed that a functional organization alignment, at least at the regional level, would afford the Agency many of the advantages of both standardization and flexibility. Regions II, IV, and IX indicate that they would like to experiment with functionalization; Region II proposes establishing divisions for planning, operations, monitoring, enforcement, and management.

Program Integration

The final issue that arose in relation to regional office organization structure during the study was that of Agency integration. Aside from the Regional Administrators and their management division directors, not many of the 148 officials interviewed indicated concern about agency integration. Most seemed to be content to operate their individual programs with limited consideration for their impact on EPA as a whole--an agency which was created to bring together the various environmental and pollution control programs of the Federal Government. It is interesting to note that the strongest proponents of EPA decentralization are those who also show concern for program integration in the Agency.

Conclusions

There are arguments which support some extension of EPA decentralization to the sub-regional level. There is no clear indication, however, of

what the nature of such sub-regionalization might best be. Clearly, EPA need not become involved in as intricate a sub-regionalization as that represented by the Department of Housing and Urban Development's Area Offices. While some type of sub-regionalization to the State level may be beneficial, budgetary and programmatic arguments against additional sub-regional offices are persuasive. EPA representatives serving as listening posts and focal points for assistance at State Capitals, however, may be a logical step in Agency decentralization and should be examined further.

Our findings do not support a clear conclusion about the value or need for the current standard regional office organization structure under decentralization. Obviously, decentralization requires some organizational latitude to permit proper treatment of specific regional problems. A standard structure similar to the current one (i.e., standard to the Division level) does not seem to create any major problems. While regional offices structured to mirror Headquarters are not considered necessary, organizational counterparts are considered helpful by some Headquarters and regional office personnel.

However, a conclusion indicated by our study is that a standard organization structure based on functionalization would assist EPA decentralization. A functional organization at the regional level would allow maximum latitude to address regional problems from within a standardized organizational structure. Regional accountability would be

maintained through the Agency's accomplishments planning system, which permits comparison measurements among the regional offices. Experimentation on a completely functionalized organization structure should be attempted in order to arrive at a model structure.

APPENDICES

SUMMARY OF AUTHORITIES DELEGATED TO THE REGIONAL OFFICES

Authority & Related Orders	Delegations
Real and Personnel Property Management 1150.2A, Chge 2, 12/23/71	All authority except: Acquisition of ADP equip & services. Acquisition of filing cabinets. Acquisition of printing & copy machine & MTST. Issuance of telephone & rental car credit cards.
Sell or declare excess or surplus Government property, & make determinations required by law or regulation with respect to the disposition and use of real property. 1150.2A, Chge 2, 12/23/71	All authority except: To dispose of or donate such property in foreign countries.
Make determinations required by law or regulation regarding the use or transfer of Govt-owned vehicles. 1150.2A, Chge 2, 12/23/72	All authority. May not redelegate authority to approve the use of Govt-owned or controlled motor vehicles between domicile & places of employment.
Make determinations required by law or regulation with respect to printing & publications. 1150.2A, Chge 2, 12/23/71	Authorized.
Approve personnel actions 1150.2A, Chge 2, 12/23/71	All authority except: Interchange of personnel with States. Actions involving GS-16 or above. Actions in-

Authority & Related Orders	Delegations
	volving Schedule C positions. Training in excess of 120 days. Labor-Management Agreements. Concurrence of Hg. required on: Details or assignments of employees to foreign govts, intern'l organizations, State or local govts, universities, congressional committees Executive Office of the President, & the White House; nonreimbursable details in excess of 30 days between EPA & other agencies. Adjudication of suitability cases. Establishing & revising position standards & descriptions. Proposed new or revised pay plans or wage schedules or positions not subject to Classification Act. Personnel actions affecting PHS officers. Requests to contracting officers for paid recruitment advertising.
Enter into agreements & contracts for procurement & construction, & take any action or make any determination required by law or regulation with respect to contracts & agreements, including designation & appointment of contracting & ordering officers. 1150.2A, Chge 2, 12/23/71	Purchase from mandatory sources and Federal agencies with no limitation. Open market purchases up to $2,000 for construction and $2,500 for other purposes. Except: Authority to contract for paid advertisements. Regions authorized to contract up to $10,000 for emergency measures needed to counteract the harmful effects of oil or other hazardous material spills.
Approval of travel 1150.2A, 04/23/71	Authorized to approve all domestic travel. Region V authorized to approve travel to Canada in relation to IJC matters.

Authority & Related Orders	Delegations
Interagency agreements 1240.2A, 09/02/71	Interagency agreements of a regional nature up to $25,000.
Agency records & files 1150.2A, Chge 2, 12/23/71	Authorized to make determinations required by law.
Organizational structure changes 1110.8A, 11/22/71	Authorized to make changes to the regional organization below the Division level.
Dissemination of certain types of information to the public 1540.1 01/03/72	Authorized.
State & local assistance grants 1150.11, 10/13/71 1150.11, Chge 1, 12/17/71, Chge 2, 02/29/72 1150.15, 06/01/72 1150.17. 07/05/72	Authorized to approve: Basin Planning Grants (Water); State Program Grants (Water); Construction Grants (Water); Planning Grants (Air) State Program Grants (Air) Authorized to disapprove & recommend approval of Solid Waste Planning Grants. Authorized to carry out comprehensive grants funded under more than one grant authority. RA's in Regions II, III, & V authorized to enter into agreements with any State, political subdivision, interstate agency, or other public agency or combination thereof to carry out projects to demonstrate new methods & techniques & to develop preliminary plans for the elimination or control of pollution within all or any part of the watersheds of the

Authority & Related Orders	Delegations
	Great Lakes pursuant to Section 15 of the FWPCA.
Standards & implementation plans 1150.11, 10/13/71 1150.18. 08/17/72	Authorized to determine whether water quality standards, including implementation plans of States are consistent with the requirements of Sec 10(c)(1) of the FWPCA. Authorized to approve State procedures for implementing & enforceing standards of performance for all new sources & for emission standards, hazardous air pollutants from stationary source located in such State, & to delegate to such State, authority to implement & enforce Federal standards in such State pursuant to Secs 111(c) & 112(d) of the Clean Air Act. Authorized to review plans for construction of new sources or for modification of existing sources to determine compliance with emission standards for hazardous air pollutants & to authorize or prohibit such construction or modification pursuant to Sec 112(c)(1)(A) of the Clean Air Act. Authorized to grant waivers permitting existing sources a period of up to two years after the effective date of emission standards for hazardous air pollutants to comply with such standards pursuant to Sec 112(c)(1)(B) of the Clean Air Act. Authorized to make findings of violation, to issue notices of violation, to issue orders, &

Authority & Related Orders	Delegations
	to confer with the alleged violator pursuant to Sec 113(a) of the Clean Air Act, except for Subsection (2) regarding federally assumed enforcement. Authorized to approve State procedures for carrying out authorities described in Sec 114(a) (1) & (2) & to delegate authorities pursuant to Sec 114(b) of the Clean Air Act.
Enforcement 1150.6, 06/23/71 1150.8, 07/13/71 1150.11, 10/13/71 1150.12, 01/21/72 1150.18, 08/17/72	Authorized to designate persons to have access to & to copy records showing delivery, movement, or holding of economic poisons or devices pursuant to Secs 5 & 6a of the Federal Insecticide, Fungicide, & Rodenticide Act as amended. Authorized to cause civil & criminal actions to be commenced pursuant to Sec 113(b) & (c) of the Clean Air Act. Authorized to require the owner or operator of any emission source to maintain records, make reports, install, use & maintain monitoring equipment or methods, sample emissions & provide other information. Authorized to enter the premises of an emission source, to inspect records or monitoring equipment & methods, to sample emissions, & to authorize representatives to exercise such authorities.

Authority & Related Orders	Delegations
	Authorized to cause civil or criminal proceedings to be commenced pursuant to Secs 204 & 205 against persons charged with removing or rendering inoperative motor vehicle emission control systems or elements of design in violation of Sec 203(a)(3) of the Clean Air Act.
	Authorized to bring suit to restrain any person causing or contributing to air pollution which is presenting an imminent & substantial endangerment to the health of persons pursuant to Sec 303 of the Clean Air Act.
	Authorized to issue written notices of warning, to issue citations to persons against whom criminal proceedings are contemplated, to give opportunity to such persons to present their views orally or in writing with regard to such contemplated proceedings to make findings of fact with respect to violations, & to certify such facts to the proper U.S. Attorney for prosecution pursuant to Sec 6c of the Federal Insecticide, Fungicide, & Rodenticide Act (FIFRA).
	Authorized to cause proceedings to be brought pursuant to Sec 9a of FIFRA for seizure & confiscation of any economic poison or device.
	Authorized to request the Secretary of the Treasury to deliver samples of economic poisons or devices being imported or offered for importation into the United States, to give notice

Authority & Related Orders	Delegations
	to & receive testimony from the owner or consignee of such economic poisons to examine such samples & to determine whether such samples are in conformity with the provisions of the FIFRA, & to request that the Secretary of the Treasury refuse admission of such economic poisons into the United States.
	Authorized to issue permits under Sec 21(b) & (c) of the FWPCA.
	Authorized to certify the issuing of a discharge permit under the Refuse Act Permit Program.
	Authorized to make certifications with respect to potable water supplies that meet the Drinking Water Standards pursuant to Sec 361 of the PHS Act.
	Authorized to make certifications with respect to air or water pollution control facilities, pursuant to Sec 169 of the Internal Revenue Code.
	Authorized to issue 180-day notices to violators & other interested parties of the violation of water quality standards.
	Authorized to recommend to the appropriate State water pollution control agency that it takes necessary remedial action where such is indicated following an enforcement conference.

Authority & Related Orders	Delegations
	Authorized to request the filing of civil suits by the Department of Justice under the Refuse Act Permit Program. Authorized to request the filing of criminal suits by the Department of Justice under the Refuse Act Permit Program. (Most enforcement authorities require advance Headquarters concurrence.)

HEADQUARTERS OFFICIALS INTERVIEWED DURING THE STUDY

Office of the Administrator	
Assistant to the Deputy Administrator;	
Director of Operations Control	Marshall C. Turner, Jr.
Office of Regional Liaison	George Marienthal
Office of Federal Activities	Sheldon Meyers
Office of Legislation	Gary H. Baise
Deputy Director, Office of Intergovernmental Affairs	Nicholas Golubin
Deputy Assistant Director	W. Richard Hager
Deputy Assistant Director	Alan Lessin
Assistant Director for Field Operations	Lane Gentry
Office of Public Affairs	Fred Stannard
Assistant Administrator for Planning and Management	Thomas E. Carroll
Office of Noise Abatement and Control	Alvin Meyer
Office of Deputy Assistant Administrator for Administration	
Personnel Management Division	Charles S. Barden, Jr.
Contracts Management Division	Edward Rhodes
Data and Support Systems Division	Arthur Nies
Office of Planning and Evaluation	
Program Planning Branch	Charles Scott (Now at Operations Coordination Staff, Office of the Deputy Adm.)
Manpower Development Staff (Now Office of Education and Manpower Planning)	George Pratt
Deputy Assistant Administrator for Resources Management	Eldon C. Taylor
Assistant Administrator for Enforcement and General Counsel	John Quarles, Jr.
Office of Program Management Operations	Roger L. Williams
Deputy Assistant Administrator for Water Enforcement	Carl Eardley
Enforcement Proceedings Division	Dominick Manfre
Legal Support Division	Thomas Truitt
Pesticides Enforcement Division	Augustus Conroy III
Office of Refuse Act Programs	Robert Hardaker

Assistant Administrator for Air and Water Programs	Robert L. Sansom
Technical Support Staff	Kenneth Mackenthun
	Edward Tuerk
Office of Program Management Operations	
Stationary Source Pollution Control Programs (Durham, N.C.)	Bernard J. Steigerwald
Program Planning Office	Norman Dunfee
Applied Technology Division	Robert Neligan
Standards Development and Implementation Division (Now Emission Standards and Engineering Division)	
Office of Water Programs	Donald Goodwin
Manpower Development Staff	Louis DeCamp
State and Local Manpower Development	John Hill & Richard Guay
Municipal Waste Water Systems Division	John Ropes
Water Quality and Non-Point Source Control Division	Ralph Palange
Oil and Hazardous Materials Division	Albert Erickson, Bruce Fisher, Lowell Keup
Water Supply Division	Kenneth Biglane
Office of Water Planning and Standards	John Cofrancesco
Water Planning Division	Joseph Krivak & David Green
Program Planning and Accomplishment Branch	Mark Pisano
State Programs Branch	Henry Cooke
Office of Air Programs Ann Arbor, Michigan	Robert Kussman
Assistant Administrator for Categorical Programs	David Alexander
Program Analysis and Evaluation	David Dominick
	G. Randolph Comstock
	Richard Hardesty
Special Assistant to Deputy Assistant Administrator for Radiation Programs	Ramon Minx
Deputy Assistant Administrator for Solid Waste Management Programs	Samuel Hale, Jr.
Systems Management Division (Cinn.)	Clyde J. Dial
Acting Deputy Assistant Administrator for Pesticides	Edwin Johnson
	Homer Hall

Associate Director for Standards and Criteria	William Preston
Associate Director, Pesticides Regulation Division	Douglas Campt
Acting Director, Laboratory Services Branch	Ronald A. Davis
Assistant Administrator for Research and Monitoring	Stanley M. Greenfield
Deputy Assistant Administrator for Monitoring	Willis B. Foster & Ted Just
Office of Program Operations, Program Management Division	David Stephan
Program Development Branch	Thomas Murphy
National Environmental Research Center (North Carolina)	
Director	Jack Finklea
Program Operations	Paul Kenline
General Accounting Office	Warren Smith

REGIONAL OFFICIALS INTERVIEWED DURING THE STUDY

Region I

Regional Administrator	John A.S. McGlennon
Deputy Regional Administrator	Clifford V. Smith, Jr.
Assistant for Congressional and Intergovernmental Relations	Stephen Ells
Public Affairs Division	Kenneth Crotty
Management Division	Merrill S. Hohman
Air and Water Programs Division	Lester A. Sutton
Categorical Programs Division	Earl J. Anderson
Surveillance & Analysis Division	Edward V. Fitzpatrick
Enforcement Division	Herbert R. Pahren

Region II

Regional Administrator	Gerald M. Hansler
Public Affairs Division	Kal Wagenheim
Management Division	Alvin R. Morris
Air & Water Programs Division	Kenneth L. Johnson
Facilities Management Branch	Rocco D. Ricci
Categorical Programs Division	Weems L. Clevenger

Region III

Acting Deputy Regional Administrator	Daniel J. Snyder III

Air & Water Programs Division	Stephen C. Wassersug
Municipal Facilities Branch	Warren L. Carter
Environmental Planning Branch	Greene A. Jones
Enforcement Division	William Riley

Region IV

Regional Administrator	Jack E. Ravan
Assistant for Congressional & Intergovernmental Relations	Frank Reed
Management Division	Douglas W. Shape Gene Mullis
Program Planning & Development Branch	Hoyt M. Rhodes
Air & Water Division	Gene B. Welsh
Enforcement Division	John C. White

Region V

Regional Administrator	Francis T. Mayo
Deputy Regional Administrator	Valdas V. Adamkus
Management Division	Donald W. Marshall
Program Planning & Development Branch	Charles W. Dougherty
Categorical Programs Division	James M. Conlon
Air & Water Programs Division	Robert J. Schneider
Surveillance & Analysis Division	
Federal Activities Branch	Donald Wallgren
Enforcement Division	James O. McDonald

Region VI

Regional Administrator	Arthur W. Busch
Deputy Regional Administrator	George R. Alexander, Jr.
Assistant for Congressional & Intergovernmental Relations	J. Paul Comola

Special Assistant for Research & Monitoring	Richard Hill
Grants Administration	Kenton Kirkpatrick
Management Division	Wallace R. Greene
Air & Water Programs Division	Dean S. Mathews
Surveillance & Analysis Division	George J. Putnicki
Enforcement Division	Bud Lively

Region VII

Regional Administrator	Jerome H. Svore
Deputy Regional Administrator	Charles V. Wright
Assistant for Congressional & Intergovernmental Relations	Carl C. Clopeck
Management Division	Earl J. Stephenson
Program Planning & Development Branch	James W. Hendricks
Categorical Programs Division	Donald A. Townley
Air & Water Programs Division	Carol V. Elmgren
Program Planning Branch	Charles H. Hajinian
Manpower Development Branch	John L. Coakley
Program Support Branch (Water)	Lewis A. Young
Program Support Branch (Air)	Dewayne E. Durst
Enforcement Division	Robert L. Markey
Surveillance & Analysis Division	Garry L. Fisk

Region VIII

Regional Administrator	John A. Green
Deputy Regional Administrator	Donald P. Dubois
Assistant for Congressional & Intergovernmental Relations	Dean E. Norris
Management Division	Samuel E. Landis

Air & Water Programs Division	Charles W. Murray
Categorical Programs Division	David A. Wagoner
Enforcement Division	Irwin L. Dickstein
Surveillance & Analysis Division	Keith A. Schwab

Region IX

Regional Administrator	Paul DeFalco, Jr.
Deputy Regional Administrator	George Milias
Assistant for Congressional & Intergovernmental Relations	Russell Freeman
Management Division	Curtiss M. Everts, Jr.
Program Planning & Development Branch	Howard S. Harris
Air & Water Programs Division	Frank M. Covington
Program Evaluation Branch	Clyde B. Eller
Categorical Programs Division	John C. Merrell, Jr.
Enforcement Division	Richard L. O'Connell
Surveillance & Analysis Division	
Technical Support Branch	Donald B. Mausshardt

Region X

Regional Administrator	James L. Agee
Public Affairs Division	Herbert E. Simison
Management Division	Hurlon C. Ray
Program Planning & Development Branch	John L. Underwood
Categorical Programs Division	Douglas C. Hansen
Surveillance & Analysis Division	Gary L. O'Neal
Enforcement Division	Len Miller
Assistant for Congressional & Intergovernmental Affairs	Mary Neilson

STATE AND CITY AGENCIES AND PUBLIC INTEREST GROUPS PROVIDING COMMENTS ON DECENTRALIZATION

State Agencies

Connecticut Department of Environmental Protection
Dan Lufkin, Commissioner

Florida Department of Rehabilitative Services, Division of Health
S. A. Berkowitz, Chief, Bureau of Sanitary Engineering

Georgia Department of Natural Resources, Environmental Protection Division
R. S. Howard, Jr., Director

Illinois Department of Agriculture
Rod Anderson, Division of Plant Industries

Illinois Environmental Protection Agency
William Blaser, Director
Phil Brunner, Office of Radiation

Indiana State Board of Health
Robert Heider, Director, Division of Sanitary Engineering
Hal Stocks, Office of Radiation

Indiana Department of Agriculture
George Hutton, Office of Pesticides

Maine Department of Environmental Protection
William R. Adams, Commissioner

Massachusetts Office of Environmental Affairs
Charles H. W. Foster, Secretary

Michigan Department of Public Health
Fred Kellow, Chief, Solid Waste Management Section
Don Van Farowe, Radiation Office

Minnesota Pollution Control Agency
Grant Merritt, Executive Director
Floyd Forsberg, Director, Division of Solid Wastes
Alice Dolezal, Radiation Office

Minnesota Department of Agriculture
Dr. Rollin Dennistoun, Pesticides Office

Mississippi Air and Water Pollution Control Commission
Glen Wood, Jr., Executive Director

Mississippi State Board of Health
J. D. Brown, Director, Sanitary Engineering

New Hampshire Water Supply and Pollution Control Commission
William Healy

New York Department of Environmental Conservation
Eugene Seebald, Director, Pure Waters Program

North Carolina Department of Human Resources
Marshall Staton, Director, Sanitary Engineering Division

North Carolina Department of Natural and Economic Resources
E. C. Hubbard, Assistant Director, Water and Air

Ohio Department of Health
Ivan Baker, Division of Sanitation
Oren Spilker, Division of Plant Industries
Jim Wynd, Radiation Office

South Carolina State Board of Health
John E. Jenkins, Chief, Bureau of Environmental Engineering
L. E. Priester, Jr., Deputy State Health Officer for Environmental Control

South Carolina Pollution Control Authority
H. J. Webb, Executive Director

Vermont Agency of Environmental Conservation
Robert B. Williams, Secretary

Washington State Department of Ecology
Beecher Snipes, Director

Wisconsin Department of Natural Resources
Thomas Frangos, Administrator

State Comments Reported Without Reference to Agencies or Individuals

Arizona
California
Hawaii
Iowa
Kansas
Missouri
Nebraska

Cities, Regional Organizations, and Public Interest Groups

Appalachian Mountain Club, Boston
Fran Belcher, Executive Director

Boston, Metropolitan District Commission
John Sears, Commissioner

East-West Gateway Coordinating Council, St. Louis, Missouri

International City Management Association

Kansas League of Municipalities, Topeka, Kansas
Richard F. Davis, Executive Secretary

Lincoln, Nebraska
Lee Blocker, Director of Public Works
Leo Shearer, Assistant City Manager and Administrative Assistant to Governor

Mid-American Regional Council, Kansas City, Missouri
Richard F. Davis, Executive Secretary

National Association of County Officials

National League of Cities and U.S. Conference of Mayors

New England Interstate Water Pollution Control Commission
Alfred Peloquin, Executive Secretary

Omaha-Council Bluffs Planning Agency, Omaha, Nebraska

Topeka, Kansas
Patrick Towle, Intergovernmental Coordinator